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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

In re: DATA BREACH SECURITY
LITIGATION AGAINST CAESARS
ENTERTAINMENT, INC.

Case No. 2:23-cv-01447-ART-BNW

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE FOR MOTION TO STAY
DISCOVERY**

(First Request)

1 WHEREAS, on September 12, 2024, Caesars filed a Motion to Dismiss Plaintiffs’
2 Consolidated Class Action Complaint (“Motion to Dismiss”);

3 WHEREAS, Caesars’ position is that discovery should be stayed while its Motion to
4 Dismiss is pending, on grounds that the Motion to Dismiss makes arguments that are dispositive
5 of the entire case, and which can be resolved without the need for discovery;

6 WHEREAS, Plaintiffs oppose Caesars’ request for a discovery stay, on grounds that a stay
7 is not warranted and would result in unnecessary delay;

8 WHEREAS, in light of the Parties’ positions, the Parties agreed that Caesars would file a
9 Motion to Stay, which Plaintiffs plan to oppose;

10 WHEREAS, on August 27, 2024, the Court entered a schedule for the briefing of Caesars’
11 Motion to Stay, based on an agreed proposal submitted by the Parties, under which Caesars is
12 currently due to file the Motion to Stay by October 30, 2024;

13 WHEREAS, in light of the existing schedule for the Motion to Dismiss, the Parties have
14 agreed that good cause exists to adjust the schedule for Caesars’ Motion to Stay, and to extend the
15 time for Caesars to file the Motion to Stay by two weeks, until November 13, 2024. There is good
16 cause to grant this request, which is not made for the purposes of delay, and which continues to
17 ensure that the Motion to Stay will be fully briefed shortly after the Motion to Dismiss.

18 It is therefore **STIPULATED** and **AGREED** that:

- 19 1. Caesars shall file its Motion to Stay Discovery (“Motion”) on or before November
20 13, 2024.
- 21 2. Plaintiffs shall file any opposition to the Motion on or before December 3, 2024.
- 22 3. Caesars shall file any reply in further support of the Motion on or before December
23 13, 2024.

Dated: October 29, 2024.

McDONALD CARANO LLP

/s/ Chelsea Latino

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: October 30, 2024